

Exhibit 1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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| In re: FAIRFIELD SENTRY LIMITED, et al., Debtor in Foreign Proceedings. | Chapter 15 Case Case No. 10-13164 (SMB) Jointly Administered |
| FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. THEODOOR GGC AMSTERDAM, et al., Defendants. | Adv. Pro. No. 10-03496 (SMB) Administratively Consolidated |
| FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. MERRILL LYNCH, PIERCE, FENNER & SMITH, INC., et al., Defendants. | Adv. Pro. No. 10-03516 (SMB) |
| FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al., Plaintiffs, v. CITIBANK NA LONDON, et al., Defendants. | Adv. Pro. No. 10-03622 (SMB) |

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BGL BNP PARIBAS S.A., et al.,

Defendants.

Adv. Pro. No. 10-03626 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS SECURITIES SERVICES
LUXEMBOURG, et al.,

Defendants.

Adv. Pro. No. 10-03627 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ROBINSON & CO., et al.,

Defendants.

Adv. Pro. No. 10-03628 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

HSBC SECURITIES SERVICES
(LUXEMBOURG) S.A., et al.,

Defendants.

Adv. Pro. No. 10-03630 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

HSBC PRIVATE BANK (SUISSE) SA, et al.,

Defendants.

Adv. Pro. No. 10-03633 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ZURICH CAPITAL MARKETS CO., et al.,

Defendants.

Adv. Pro. No. 10-03634 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ABN AMRO SCHWEIZ AG, et al.,

Defendants.

Adv. Pro. No. 10-03635 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ABN AMRO SCHWEIZ AG, et al.,

Defendants.

Adv. Pro. No. 10-03636 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

CITIBANK (SWITZERLAND) AG, et al.,

Defendants.

Adv. Pro. No. 10-03640 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

ABN AMRO RETAINED NOMINEES
(IOM) LIMITED, et al.,

Defendants.

Adv. Pro. No. 10-03776 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

UBS AG NEW YORK, et al.,

Defendants.

Adv. Pro. No. 10-03780 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

MERRILL LYNCH BANK (SUISSE) SA,
et al.,

Defendants.

Adv. Pro. No. 10-03788 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

UBS FUND SERVICES (CAYMAN) LTD.,
et al.,

Defendants.

Adv. Pro. No. 10-04095 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS ARBITRAGE SNC, et al.,

Defendants.

Adv. Pro. No. 10-04098 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS PRIVATE BANK & TRUST
CAYMAN LTD., et al.,

Defendants.

Adv. Pro. No. 10-04099 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

FS/FORTIS BANQUE LUXEMBOURG,
et al.,

Defendants.

Adv. Pro. No. 11-01242 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

UBS EUROPE SE LUXEMBOURG
BRANCH, et al.,

Defendants.

Adv. Pro. No. 11-01250 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

UBS FUND SERVICES (IRELAND) LTD.,
et al.,

Defendants.

Adv. Pro. No. 11-01258 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

MERRILL LYNCH INTERNATIONAL,
et al.,

Defendants.

Adv. Pro. No. 11-01463 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS SECURITIES NOMINEES
LTD., et al.,

Defendants.

Adv. Pro. No. 11-01579 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

FORTIS BANK NEDERLAND NV, et al.,

Defendants.

Adv. Pro. No. 11-01614 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

FORTIS BANK, SA/NV, et al.,

Defendants.

Adv. Pro. No. 11-01617 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

FORTIS GLOBAL CUSTODY SERVS. N.V.,
et al.,

Defendants.

Adv. Pro. No. 11-02422 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

CITIGROUP GLOBAL MARKETS LTD.,
et al.,

Defendants.

Adv. Pro. No. 11-02770 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

BNP PARIBAS ESPANA, et al.,

Defendants.

Adv. Pro. No. 12- 01551 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

SOMERS NOMINEES (FAR EAST) LTD.,
et al.,

Defendants.

Adv. Pro. No. 12-01556 (SMB)

FAIRFIELD SENTRY LTD. (IN
LIQUIDATION), et al.,

Plaintiffs,

v.

FORTIS GLOBAL SERVS. NV, et al.,

Defendants.

Adv. Pro. No. 12-01568 (SMB)

**[PROPOSED] ORDER GRANTING THE FOREIGN REPRESENTATIVES' MOTION
FOR LEAVE TO FILE THE FURTHER PROPOSED AMENDED COMPLAINTS IN
THE KNOWLEDGE ACTIONS**

UPON REVIEW AND CONSIDERATION of the motion for leave to file the further proposed amended complaints dated January 15, 2020 (the "Motion") in the above-captioned actions (the "Knowledge Actions"), and the Memorandum of Law in support thereof, as filed by or on behalf of Kenneth M. Kryz and Greig Mitchell (together, the "Liquidators" or "Foreign Representatives"), in their capacities as the duly appointed Liquidators and Foreign

Representatives of Fairfield Sentry Limited (In Liquidation) (“Sentry”), Fairfield Sigma Limited (In Liquidation) (“Sigma”), and Fairfield Lambda Limited (In Liquidation) (“Lambda” and, collectively with Sentry and Sigma, the “Funds”) in these consolidated adversary proceedings (the “U.S. Redeemer Actions”); and

WHEREAS Defendants have failed to demonstrate that the filing of the Further Proposed Amended Complaints would be futile, was the product of bad faith, or would lead to undue delay or undue prejudice;

It is hereby **ORDERED** that:

1. The Motion is **GRANTED**.
2. The Liquidators are authorized to file an amended complaint in each of the Knowledge Actions, in substantially the form of the Further Proposed Amended Complaint filed on the docket for each Knowledge Action listed in the above caption.

IT IS SO ORDERED

This ____ day of _____, 2020.

THE HONORABLE STUART M. BERNSTEIN
United States Bankruptcy Court for the
Southern District of New York